

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ROCKDALE COUNTY,

Plaintiff,

v.

BIO-LAB INC., *et al.*,

Defendants.

C.A. No. 1:24-cv-04916-SEG

JURY TRIAL DEMANDED

NOTICE OF PROPOSED AGENDA FOR
STATUS CONFERENCE

Plaintiff Rockdale County and Defendants Bio-Lab, Inc., KIK International, LLC, and KIK Custom Products, Inc., (together, “Parties”), pursuant to this Court’s March 24, 2025, Minute Order in case No. 1:24-cv-04407-SEG, submit the following *Notice of Proposed Agenda* for the May 29, 2025, Status Conference.

Agenda Item 1: Discovery Update

On May 15, 2025, Plaintiff served Defendants with its *Objections and Responses to Bio-Lab Inc. and KIK Defendants’ First Set of Requests for Production of Documents* and its *Supplemental Initial Disclosures*. Plaintiff will be serving a supplemental production of documents on May 23, 2025.

On May 21, 2025, Plaintiff requested that a duplicate of all Defendants’ responses and productions in the *In Re: Bio-Lab Class Action*, Case No. 1:24-cv-

04407-SEG be served on Plaintiff. Plaintiff and Defendants will meet and confer on this request.

Dated: May 23, 2025

/s/ Michael A. Caplan

Michael A. Caplan

Ga. Bar No. 601039

Michael L. Eber

Ga. Bar No. 859338

Jessica Arnold Caleb

Ga. Bar No. 141507

Emily C. Snow

Ga. Bar No. 837411

Alan M. Long

Ga. Bar No. 367326

CAPLAN COBB LLC

75 Fourteenth Street NE, Suite 2700

Atlanta, Georgia 30309

Tel: (404) 596-5600

Fax: (404) 596-5604

mcaplan@caplancobb.com

meber@caplancobb.com

jarnold@caplancobb.com

esnow@caplancobb.com

along@caplancobb.com

Alan E. Schoenfeld*

Thomas K. Bredar*

WILMER CUTLER PICKERING

HALE AND DORR LLP

7 World Trade Center

250 Greenwich Street

New York, NY 10007

Tel.: (212) 230-8800

Fax: (212) 230-8888

alan.schoenfeld@wilmerhale.com

Respectfully submitted,

/s/ Mirza Qader Ali Baig

Mirza Qader Ali Baig (GA # 031610)

M. QADER A. BAIG &

ASSOCIATES, LLC

913 Commercial Street NE, Suite B

Conyers GA 30012-4537

Tel. (770) 929-1665

mqab@mqablaw.com

/s/ Shayna E. Sacks

Shayna E. Sacks

(Admitted Pro Hac Vice)

NAPOLI SHKOLNIK PLLC

360 Lexington Avenue, Floor 11

New York NY 10017-6502

Tel. (212) 397-1000

ssacks@napolilaw.com

Hunter J. Shkolnik

(Admitted Pro Hac Vice)

Paul J. Napoli

(Admitted Pro Hac Vice)

Veronica N. Vazquez

(Admitted Pro Hac Vice)

NS PR LAW SERVICES LLC

1302 Avenida Ponce de León

San Juan PR 00907-3982

Tel. (833) 271-4502

hunter@nsprlaw.com

pnapoli@nsprlaw.com

Counsel for Plaintiff

thomas.bredar@wilmerhale.com

Felicia H. Ellsworth*

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

60 State Street

Boston, MA 02109

Tel: (617) 526-6000

Fax: (617) 526-5000

felicia.ellsworth@wilmerhale.com

Robin C. Burrell*

**WILMER CUTLER PICKERING
HALE AND DORR LLP**

2100 Pennsylvania Avenue NW

Washington DC 20037

Tel: (202) 663-6000

Fax: (202) 663-6363

robin.burrell@wilmerhale.com

Counsel for Defendants

**Pro hac vice*

CERTIFICATE OF COMPLIANCE WITH LOCAL RULE 5.1

The undersigned hereby certifies that the foregoing document has been prepared in accordance with the font type and margin requirements of Local Rule 5.1 of the Northern District of Georgia, allowing the font type of Book Antiqua and point size of 13.

/s/ Shayna E. Sacks
Shayna E. Sacks

CERTIFICATE OF SERVICE

The undersigned certifies that a copy of the foregoing document was served on all parties who have appeared in this case on May 23, 2025 via the Court's CM/ECF system.

/s/ Shayna E. Sacks
Shayna E. Sacks